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15			
16	UNITED STATES DISTRICT COURT		
17	NORTHERN DISTRICT OF CALIFORNIA		
18	NORTHERN BIST	ader of even order	
19			
	DANIEL MATERA and SUSAN RASHKIS, as individuals, and on behalf of other persons	Case No. 5:15-cv-04062 LHK	
20 21	similarly situated,	STIPULATION AND [PROPOSED] ORDER STAYING PROCEEDINGS PENDING	
22	Plaintiffs,	APPROVAL OF CLASS ACTION SETTLEMENT	
23	v.		
24	GOOGLE, INC.,	Honorable Lucy H. Koh	
	Defendant.		
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1	WHEREAS, Plaintiffs Daniel	Matera and Susan Rashkis ("Plaintiffs") and Defendant	
2	Google Inc. have successfully mediated a resolution of the case, finalized a settlement agreement,		
3	and all parties have fully executed a complete settlement agreement.		
4	NOW THEREFORE, ALL P	PARTIES, BY AND THROUGH THEIR UNDERSIGNED	
5	COUNSEL hereby stipulate and respectfully request that:		
6	All non-settlement proceedings in this action, including all deadlines set forth in the		
7	Court's May 25, 2016 Case Management Order (Docket No. 40) and specifically the November		
8	21, 2016 and December 21, 2016 class certification expert report deadlines, shall be stayed until		
9	further Order of the Court.		
10	Plaintiffs will file a motion for preliminary settlement approval within 30 days of the		
11	Court's entry of the below Order.		
12			
13	IT IS SO STIPULATED.		
14	Dated: November 28, 2016	Respectfully submitted,	
15	Dated: November 26, 2010	LIEFF CABRASER HEIMANN & BERNSTEIN, LLP	
16		EIEIT CADRASER HEIWARR & BERRSTEIN, EEI	
17		By:/s/ Michael W. Sobol	
18		Michael W. Sobol	
19		LIEFF CABRASER HEIMANN & BERNSTEIN LLP Michael W. Sobol	
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Case 5:15-cv-04062-LHK Document 60 Filed 11/28/16 Page 3 of 4 1 Ray E. Gallo (SBN 158903) rgallo@gallo-law.com 2 Dominic R. Valerian (SBN 240001) dvalerian@gallo-law.com 3 GALLO LLP 1299 Fourth St., Suite 505 San Rafael, CA 94901 4 Telephone: 415.257.8800 5 Attorneys for Plaintiff and the Proposed Class 6 Dated: November 28, 2016 **COOLEY LLP** 7 8 By: /s/ Whitty Somvichian 9 Michael G. Rhodes (116127) rhodesmg@cooley.com 10 Whitty Somvichian (194463) wsomvichian@cooley.com 11 Kyle C. Wong (224021) kwong@cooley.com 12 Karen L. Burhans (303290) kburhans@cooley.com 13 Amy M. Smith (287813) amsmith@cooley.com 14 **COOLEY LLP** 101 California Street, 5th Floor 15 San Francisco, CA 94111-5800 16 Telephone: (415) 693-2000 Facsimile: (415) 693-2222 17 Attorneys for Defendant Google Inc. 18 19 PURSUANT TO STIPULATION, IT IS SO ORDERED. 20 21 Date: , 2016 22 LUCY H. KOH 23 United States District Judge 24 25 26 27

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1	ATTESTATION PURSUANT TO CIV. L.R. 5-1(i)(3)
2	I, Michael W. Sobol, attest that concurrence in the filing of this STIPULATION AND
3	[PROPOSED] ORDER STAYING PROCEEDINGS PENDING APPROVAL OF CLASS
4	ACTION SETTLEMENT has been obtained from Whitty Somvichian. I declare under penalty
5	of perjury under the laws of the United States of America that the foregoing is true and correct.
6	Executed this 28 th day of November, 2016, at San Francisco, California.
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8	<u>/s/ Michael W. Sobol</u> Michael W. Sobol
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